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BSF SCHILLER FLEXNER

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September 16, 2024

VIA ECF

The Honorable Lewis A. Kaplan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 USUCALNY
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DATE FILED: 9-17-24

Re: United States v. Mauricio Rene Garcia Quimbayo, 21 Cr. 359 (LAK)

Dear Judge Kaplan:

We respectfully write the Court to request an adjournment of Mr. Garcia Quimbayo's sentencing date, which is presently scheduled for September 19, 2024, at 2:30 p.m., until early October or another time convenient for the Court.

Pursuant to the Court's scheduling requirements, Mr. Garcia Quimbayo submitted his sentencing submission on September 5, 2024. However, because the Government has been on trial in a different matter, it will be submitting its sentencing submission this evening (the defense consented to the extension of time for that submission). Mr. Garcia Quimbayo presently is detained at the Hudson County Jail in New Jersey. Defense counsel respectfully requests additional time so that it can meet with Mr. Garcia Quimbayo in New Jersey to further prepare for sentencing after receiving the Government's submission and will not be able to do so in advance of Thursday. Accordingly, the defense is seeking this adjournment to fully prepare the defendant for his sentencing.

The Government does not object to Mr. Garcia Quimbayo's request. We apologize to the Court for any inconvenience and appreciate the Court's consideration of this request.

Respectfully submitted,

/s/ John T. Zach John T. Zach

cc: Counsel of Record

Sentencing adouted to 10.2.24 at 10 am so ordered //

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